

Kevin H. Sharp

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

UNITED STATES OF AMERICA

v.

MICHAEL THOMPSON

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No. 3:08-cr-00218
SENIOR JUDGE ECHOLS

MOTION FOR PERMISSION TO TRAVEL OUTSIDE THE JUDICIAL DISTRICT

Undersigned counsel respectfully files this Motion on behalf of Defendant Michael Thompson, at the request of Mr. Thompson and Federal Probation Officer Eric Illarmo. In support of this Motion, Mr. Thompson would show the following:

(1) Undersigned counsel represented Mr. Thompson when counsel was an Assistant Federal Public Defender; now in private practice, counsel agreed to file this Motion, *pro bono*. In 2009, Mr. Thompson accepted responsibility for unlawful possession of a firearm, and entered a plea of guilty; Judge Echols then sentenced Mr. Thompson to fifty-five (55) months of imprisonment, followed by three (3) years of supervised release. Mr. Thompson is now currently on supervised release in this District.

(2) Counsel has discussed this matter with the Probation Office for the Middle District of Tennessee, and has personally discussed the instant Motion with Federal Probation Officer Eric Illarmo, who is supervising Mr. Thompson. Mr. Illarmo has authorized counsel to advise the Court both that he is not opposed to this trip as the supervising officer, and that the Probation Office for this District is also not opposed. However, in order to permit Mr. Thompson to travel out of the state, and out of the country, the Probation Office advised that Mr. Thompson would need to seek leave of the Court through this Motion.